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**From:** Wolf, Joel [Wolf.Joel@epa.gov]  
**Sent:** 12/18/2019 5:52:54 PM  
**To:** Culleen, Lawrence E. [Lawrence.Culleen@arnoldporter.com]  
**CC:** Barone, Stan [Barone.Stan@epa.gov]; Hartman, Mark [Hartman.Mark@epa.gov]; Fehrenbacher, Cathy [Fehrenbacher.Cathy@epa.gov]  
**Subject:** RE: gaining access to NMP / PBPK code

Thanks Larry. I appreciate the note on Eileen and her efforts!

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Joel Wolf  
Acting Director, Chemical Control Division  
OCSPP/OPPT  
US Environmental Protection Agency  
WJC East, Room 4146A  
202.564.0432, wolf.joel@epa.gov

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**From:** Culleen, Lawrence E. <Lawrence.Culleen@arnoldporter.com>  
**Sent:** Wednesday, December 18, 2019 12:51 PM  
**To:** Wolf, Joel <Wolf.Joel@epa.gov>  
**Cc:** Barone, Stan <Barone.Stan@epa.gov>; Hartman, Mark <Hartman.Mark@epa.gov>; Fehrenbacher, Cathy <Fehrenbacher.Cathy@epa.gov>  
**Subject:** RE: gaining access to NMP / PBPK code

Joel --

Received your message and I note the XL files have been uploaded. [https://www.epa.gov/sites/production/files/2019-11/16\\_draft\\_risk\\_evaluation\\_for\\_n-methylpyrrolidone\\_supplemental\\_excel\\_file\\_on\\_occupational\\_risk\\_calculations.xlsx](https://www.epa.gov/sites/production/files/2019-11/16_draft_risk_evaluation_for_n-methylpyrrolidone_supplemental_excel_file_on_occupational_risk_calculations.xlsx)

I very much appreciate your efforts and those of others on this string to make this happen.

It should not go without saying that Eileen Sheehan also has been extremely diligent in trying to respond on this topic and in keeping me informed. Her efforts also are much appreciated.

Thank you.

Larry

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Partner

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**From:** Culleen, Lawrence E. <Lawrence.Culleen@arnoldporter.com>  
**Sent:** Wednesday, December 18, 2019 8:38 AM  
**To:** Wolf, Joel <Wolf.Joel@epa.gov>  
**Cc:** Barone, Stan <Barone.Stan@epa.gov>; Mark A. Hartman <hartman.mark@epa.gov>; Fehrenbacher, Cathy

<Fehrenbacher.Cathy@epa.gov>  
**Subject:** Re: gaining access to NMP / PBPK code

Thanks Joel.

I'd be glad to work directly with whomever can assist to arrange the pick up of a thumb drive or CD if that would work.

Larry

Lawrence Cullen  
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**From:** "Wolf, Joel" <Wolf.Joel@epa.gov>  
**Sent:** Wednesday, December 18, 2019 7:22 AM  
**To:** Cullen, Lawrence E.  
**Cc:** Barone, Stan; Hartman, Mark; Fehrenbacher, Cathy  
**Subject:** Re: gaining access to NMP / PBPK code

External E-mail

Thanks for the note and good to see you as well Larry. Let me discuss with Stan and Cathy in the morning to see what we can figure out.

Sent from my iPhone

On Dec 17, 2019, at 6:24 PM, Cullen, Lawrence E. <Lawrence.Cullen@arnoldporter.com> wrote:

Joel,

It was good seeing you again today during our meeting with Lynn and Alex during which the Consortium discussed issues of importance to the semiconductor industry.

I noted when I got back to the office late today that a new item has been added to the e-docket for the NMP draft Risk Evaluation that appears to be potentially related to our request for access to the background materials needed to understand and interpret the human exposure (workplace) PBPK analysis. It appears from Cathy's note to the file that a CD may have been placed in the public reading room for the NMP docket. See attached.

You might recall, and I am sure Stan will remember, that gaining such access was an issue we have been raising with key EPA staff even prior to the SACC meeting. During the Peer Review session, we were led to believe the Semiconductor Industry Association (SIA) would be given access to the files we have expressed interest in reviewing. The attached note implies the files can be readily reduced to a CD. Based on the exchanges EPA personnel had with the Peer Reviewers, perhaps we can conclude the Agency also is planning to distribute a similar CD to SIA?

I would be very happy to personally come back to the Agency’s offices again tomorrow to pick up a copy of such a CD if one can be released to me on behalf of SIA. I am sure you recognize that the SIA scientists and consultants with whom we are working are not able to travel to Washington to personally sit in the public docket reading room to painstakingly review the numerous data files using a shared copy of a public version of a CD.

I am not aware that the public reading room personnel have the capacity to make copies of the CD on a “real-time” basis.

Can a member of your staff or Stan’s team let me know how we can retrieve a copy of the CD for SIA’s use?

Sorry to have to bother you with this request, but we very much want to get the CD to make use of it before it is too late to offer meaningful comments.

Larry

\_\_\_\_\_  
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**From:** Cullen, Lawrence E. <[Lawrence.Cullen@arnoldporter.com](mailto:Lawrence.Cullen@arnoldporter.com)>  
**Sent:** Monday, December 16, 2019 5:56 PM  
**To:** [hartman.mark@epa.gov](mailto:hartman.mark@epa.gov)  
**Cc:** joel wolf ([Wolf.joel@Epa.gov](mailto:Wolf.joel@Epa.gov)) <[Wolf.joel@Epa.gov](mailto:Wolf.joel@Epa.gov)>; Stanley Barone ([Barone.stan@epa.gov](mailto:Barone.stan@epa.gov)) <[Barone.stan@epa.gov](mailto:Barone.stan@epa.gov)>  
**Subject:** NMP Risk Evaluation

Gents --

My clients at the Semiconductor Industry Association submitted the attached request for an extension of the comment period for the draft Risk Evaluation for NMP. Thus far, we have not received a reply. Can you let me know if this is being considered favorably?

We are still struggling to try to get the data and Excel files related to the PBPK modeling for NMP exposures that were discussed in the SAAC meeting. It appears that the files have not been made available in the public docket. If I am mistaken in that regard, please advise how I can locate the files. If the files are not yet available to the public, I am hoping one of you might be able to assist me in this regard and also advise whether the extension request will be granted.

Thank you. I look forward to hearing from you.

Larry

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<NMP docket entry 12.16.19 EPA-HQ-OPPT-2019-0236-0036.pdf>

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